

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	No. 008 CR 00009-2
v.)	Hon. Virginia M. Kendall
)	presiding
LEON AMIEL, JR.)	
aka Leon Glass,)	
Defendant.)	

UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE PRE-TRIAL MOTIONS

Now comes the defendant, LEON AMIEL, by and through his attorney, THOMAS A. GIBBONS, of KREITER AND GIBBONS & ASSOCIATES, and moves this Honorable Court to enter an order granting the defendant an extension of time within which to file his pre-trial motions, and in support thereof states as follows:

1. On March 27, 2008, the undersigned was appointed to represent the defendant, and the court ordered pretrial motions to be filed by or on May 12, 2008.
2. On April 15, 2008, the government sent defense counsel extensive discovery material, much of which is contained on discs, including audio and video recordings.
3. The defendant resides in New York, and the government agreed to make an additional copy of the discovery discs for the defendant to review, but these additional copies have not yet been received by the undersigned.
4. The defendant would like to review the discovery materials and discuss these materials with the undersigned before the filing of any pretrial motions.

5. Additionally, the undersigned has been unable to complete review of the tendered materials due to a currently heavy case load.

6. The government has no objection to the instant motion.

Wherefore, the defendant respectfully requests that this Honorable Court extend the time for the filing of pretrial motions an additional 45 days, in order to allow the defendant an opportunity to obtain and review the discovery materials and discuss these materials with his counsel.

Respectfully submitted,

s/Thomas A. Gibbons

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STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

PROOF OF SERVICE

I, Thomas A. Gibbons, an attorney, hereby certify and verify that on April 30, 2008, I electronically delivered a copy of the foregoing NOTICE OF MOTION AND UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS to those attorneys who are e-filers.

By: s/ Thomas A. Gibbons

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